

Monitoring & Technical Assistance Guide for Homeless Programs – ESG Edition



Lake County Community Development



- ✚ Ensuring homeless funding is used effectively to assist homeless individuals & families to achieve self-sufficiency
- ✚ Complying with Federal Regulations and program requirements to maintain and expand funding
- ✚ Building grantee capacity & improving program performance to end homelessness in Lake County

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Updated May 1, 2010

#	Requirement	Minimum Standard
Documentation Requirements		
1)	Program maintains adequate documentation to demonstrate participants were homeless prior to entry into the program in accordance to 24 CFR 583.5. (Appendix 1 contains HUD definitions of homeless & required documentation)	All client files reviewed meet the minimum documentation requirements in accordance to 24 CFR 583.5 to demonstrate participants are homeless prior to entry into the program or the program has a documented plan of correction to ensure all new and current clients have the necessary documentation.
2)	Program maintains adequate documentation to demonstrate participants are part of the target subpopulation (i.e. disabled adults, women with children, youth, adult men, etc...) described in the approved application. Special attention should be paid to the definition of disability	All client files reviewed meet the minimum documentation requirements to demonstrate participants are part of the target subpopulation described in the approved application or the program has a documented plan of correction to ensure all new and current clients have the necessary documentation.
3)	Program maintains adequate documentation to demonstrate participants in the ESG program do not reside in the program for longer than 6 months (as applicable).	All client files reviewed demonstrate that participants do not exceed allowable time limits or less than 15% of files reviewed exceed the allowable time limits with written approval from Lake County or HUD or the program has a documented plan of correction to ensure all new and current clients have the necessary documentation.
Program Design & Policies		
4)	At least one homeless or formerly homeless person participates in a policy-making function within the program in accordance to 24 CFR 583.3(f) and, to the maximum extent practicable, involve the homeless in operating the program.	At least one homeless or formerly homeless person meaningfully serves on the grantee's Board of Directors or similar entity that considers and sets policies for the program.
5)	Program follows, to the maximum extent practicable, policies and procedures to ensure participants do not immediately become homeless when leaving the program (FOR PROGRAMS THAT ARE DESIGNED TO SERVE CLIENTS 6 WEEKS OR LONGER ONLY).	Program follows written plans to help residents acquire housing upon leaving the program and 80% of client files demonstrate diligent efforts to secure suitable housing.



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Supportive Services		
6)	Case Management includes a timely in person assessment of need as well as the development of an Individualized Service Plan (ISP) that includes identification of need, services to be provided and auspices under which they are to be provided, the amount, scope, and duration of services, and client goals.	90% of client files reviewed have an Individual Service Plan (ISP) that includes identification of need, services to be provided and auspices under which they are to be provided, the amount, scope, and duration of services, and client goals. In addition, clients receive a copy of their ISP signed by both the caseworker and client.
7)	Program follows a written policy to systematically identify participants eligible for mainstream benefits, help participants enroll in all mainstream benefits for which they may be eligible, & ensure participants continue to receive benefits and effectively use those benefits to maintain self-sufficiency.	Program follows a written policy to screen clients for mainstream benefits during intake, help participants enroll in all mainstream benefits for which they may be eligible, & ensure participants continue to receive benefits and effectively use those benefits to maintain self-sufficiency
8)	Program provides follow-up of clients for a minimum of 6 months after leaving the program.	In 75% of client files reviewed, the program demonstrates significant attempts to follow-up with clients within 6 months after leaving the program.
Housing		
9)	Housing is clean, secure, and in accordance to HUD Housing Quality Standards (HQS).	Facility meets all Housing Quality Standards (HQS) and holds a Certification of Occupancy (when applicable). If the kitchen/dining area is communal, the program posts an appropriate local health certificate (when applicable).
Financial		
10)	Program follows written policies and procedures to maintain adequate oversight and control of its finances to ensure accurate, current, and complete disclosure of financial results.	Program follows written procedures to record financial transactions, determine the reasonableness and allowability of costs, separate duties to ensure no one individual has authority over an entire financial transaction, and routinely compare expenditure & budget.
11)	Expenditures are eligible under the grant agreement / program regulations, are correctly classified, are supported by the general ledger, timesheets, payroll register, invoices, contracts, purchase orders, & receipts, and payment vouchers are submitted at least quarterly.	Payment vouchers are submitted at least quarterly and all expenditures reviewed are eligible, correctly classified, & have sufficient supporting documentation to demonstrate expenditures were incurred & justified.



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12)	Program maintains time sheets that demonstrate salaries that are chargeable to more than one funding source or salaries shared among more than one budget line item are accurately allocated.	For all HUD funded positions, the program maintains time sheets that are signed and dated by the staff member and their supervisor. Time is recorded as actual time engaged in HUD activities (not percentages) and corresponds with billing information.
13)	Program demonstrates meeting minimal match requirements of ESG (100%)	Program leverage reports and vouchers provide adequate supporting documentation to demonstrate meeting cash match requirements, including the specific amount and source of cash match.
14)	Program conducts an annual audit by an independent auditor that does not reveal findings or weaknesses that raise concerns about the agency's ability to sustain itself or meet grant obligations.	Most recent annual audit states that financial statements accurately reflect the actual revenues, assets, expenditures, & liabilities and the grantee quickly resolved any audit deficiencies, compliance findings, questioned costs, or recommendations.
15)	Program maintains a responsible financial plan and fundraising strategy updated annually and does not use HUD funds to replace State or Local government funds.	Program follows a written financial & fundraising plan updated annually and does not use HUD funds to replace local funds.
16)	Program follows written standards and guidelines for procurement to ensure that they are obtained as economically as possible through an open and competitive process, and that purchases are managed with good administrative practices and sound business judgment & prohibits conflicts of interest.	Program follows written procurement procedures that specify the steps taken to avoid the purchase of unnecessary items, some form of cost/price analysis for goods and services over \$1,000, and a system in place for tracking property and other assets bought or leased through grant funds.
Progress and Reporting		
17)	Program accurately enters all client information and entry/exit worksheets in the ServicePoint Homeless Management Information System within 5 days of services being provided.	Program enters all client data and entry/exit worksheets in ServicePoint within 5 days of services being provided and program holds valid consent to service and release of information forms as necessary.
18)	Program is progressing as planned in the original application – outcome goals and proposed number of clients served are achievable and within reach	Progress is in line with outcome goals set in application, and actual clients served is in line with proposed number
19)	Quarterly reports are submitted on time with accurate and quality data	Quarterly reports are submitted on time with accurate and quality data
20)	Program is clearly meeting a goal in the Consolidated Plan, and has quantifiable data available for performance reporting.	Program demonstrates evidence that Consolidated Plan goal is being met and produces quantifiable quality data for performance reporting



CLIENT INTERVIEW QUESTIONS

1. Is the facility normally clean, secure, and well maintained?
2. Do you understand the grievance procedures? Have you ever filed a complaint?
3. Have problems that you raise (formally or informally) been properly addressed?
4. Are you given the opportunity to participate in the design and/or decision making of the program?
5. Does the program foster a comfortable and safe environment?
6. Have you received all the services that you need?
7. How could the program improve?
8. If you are charged rent, how is that calculated? Do you have to pay any other fees for services?
9. Do you feel the program keeps information about you confidential?
10. How long have you been in the program?
11. Do you know what is in your Individual Service Plan?
12. Do you have any other comments about the program?



OTHER FEDERAL REQUIREMENTS:

1. National Affordable Housing Act 24 CFR 576.79; 576.80
2. Fair Housing Act 43 U.S.C. 3601-20; 24CFR part 100 & 107
3. Executive Order 11063
4. Civil Rights Act of 1964 42 U.S.C. 2000d-2000d-4; 24 CFR part 1
5. Age Discrimination Act 42 U.S.C. 61107-07; 24 CFR part 146
6. Rehabilitation Act of 1973 29 U.S.C. 794
7. American's with Disabilities Act 28 CFR part 36
8. Housing & Urban Development Act of 1968 12 U.S.C 1701U
9. Grantee must make effort to use women and minority owned businesses per Executive Order 11625, 12432, & 12138
10. Lead Based Paint Requirements 24 CFR 576.79
11. Use of facilities and services must be available to all on a nondiscriminatory basis. Grantee must have procedures to make know the availability of facilities and services so it is likely to reach persons of any race, color, religion, sex, age, familial status, national origin, and persons with disabilities.
12. Lead Based Paint requirements 24 CFR 576.79(c)
13. Flood Insurance 24 CFR 576.80(b)
14. Relocation Requirements 24 CFR 576.80(b)
15. Minimize Displacement 24 CFR 576.80(a)
16. Conflict of Interest (24 CFR 675.70(d); 24 CFR 84.42
17. Drug Free Workplace
18. Lobbying & Disclosure of Information Section 1532, Title 31, U.S. Code
19. Primarily Religious Organizations 24 CFR 576.22(b)



HOMELESS ELIGIBILITY – 24 CFR 583.5

HUD defines homelessness using the following definition: A homeless person is someone who is living on the street or in an emergency shelter, or who would be living on the street or in an emergency shelter without HUD's homelessness assistance. A person is considered homeless only when he/she resides in one of the places described below:

- In places not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, on the street;
- In an emergency shelter;
- In transitional or supportive housing for homeless persons who originally came from the streets or emergency shelters;
- In any of the above places but is spending a short time (up to 30 consecutive days) in a hospital or other institution;
- Is being evicted within a week from a private dwelling unit and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing or their housing has been condemned by housing officials and is no longer considered meant for human habitation;
- Is being discharged within a week from an institution in which the person has been a resident for more than 30 consecutive days and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing; or
- Is fleeing a domestic violence housing situation and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing.

Homelessness Documentation

HUD requires ESG, SHP, & S+C recipients to maintain adequate documentation to determine the eligibility of persons served by HUD's homeless assistance programs. For homeless prevention activities, the recipient organization must obtain evidence of an eviction, foreclosure, or utility termination notice(s) and evidence that the inability to pay was sudden, necessary to prevent homelessness, and resumption of payment is reasonably expected within the near future. Evidence would include, for example, notice of termination from the utility provider, court documents indicating that eviction was imminent or foreclosure documents indicating that foreclosure proceedings were pending. "Sudden" loss of income means, for example, the loss of a job, or the inability to work due to illness. For all activities other than homeless prevention, the chart on the following page describes the homeless documentation that is required in each client's file:

Situation	Documentation
Persons living on the street or in short-term emergency shelter	Information should be obtained to indicate that the participant is living on the street or in short-term emergency shelter. This may include names of organizations or outreach workers who have assisted them in the past, whether the client receives any general assistance checks and where the checks are delivered, or any other information regarding the participant's activities in the recent past that might provide documentation. If unable to verify that the person is living on the street or in short-term emergency shelter, the participant or a staff person may prepare a short written statement about the participant's previous living place. The participant should sign the statement and date it.
Persons coming from transitional housing for homeless persons	Obtain written verification from the transitional housing staff that the participant has been residing at the transitional housing facility. The verification should be signed and dated by the referring agency personnel. Also obtain written verification that the participant was living on the streets or in an emergency shelter prior to living in the transitional housing facility (see above for required documentation for emergency shelter), or was discharged from an institution or evicted from a private dwelling prior to living in the transitional housing and would have been homeless if not for the transitional housing (see below for required documentation for eviction from a private dwelling).
Persons being evicted from a private dwelling	Obtain evidence of formal eviction notice indicating that the participant was being evicted within a week before receiving homeless assistance. Also obtain information on the participant's income and efforts made to obtain housing and why, without the homeless assistance, the participant would be living on the street or in an emergency shelter. If the participant's family is evicting, a statement describing the reason for eviction must be signed by the family member and dated. In other cases where there is no formal eviction process, persons are considered evicted when they are forced out of the dwelling unit by circumstances beyond their control. In those instances, obtain a signed and dated statement from the participant describing the situation. The grantee/recipient must make efforts to confirm that these circumstances are true and have written verification describing the efforts and attesting to their validity. The verification should be signed and dated.
Persons from a short-term stay (up to 30 consecutive days) in an institution who previously resided on the street or in an emergency shelter	Obtain written verification from the institution's staff that the participant has been residing in the institution for less than 31 days and information on the previous living situation. See above for guidance.
Persons being discharged from a longer stay in an institution	Obtain evidence from the institution's staff that the participant was being discharged within the week before receiving homeless assistance. Obtain information on the income of the participant, what efforts were made to obtain housing and why, without the homeless assistance, the participant would be living on the street or in an emergency shelter.
Persons fleeing domestic violence	Obtain written verification from the participant that he/she is fleeing a domestic violence situation. If a participant is unable to prepare verification, the grantee/recipient may prepare a written statement about the participant's previous living situation for the participant to sign and date.